

IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

UNITED STATES OF AMERICA) CRIMINAL NO: 4:08 - 504
)
)
Vs.)
)
ANTWAN LAVERN GRAHAM)

MOTION FOR DOWNWARD DEPARTURE

NOW COMES the United States, by and through its undersigned attorney, and would respectfully make motion to the above-referenced court pursuant to § 5K1.1 of the United States Sentencing Guidelines and Title 18, United States Code, § 3553(e), that this Honorable Court depart downward from the applicable guidelines regarding the defendant, ANTWAN LAVERN GRAHAM, and, in support of such motion, does state as follows:

Mr. Graham helped to identify Tonto Edwards as the person who committed an armed robbery in Lake City, South Carolina, on August 11, 2009. As a result of Mr. Graham's information, Mr. Edwards was charged in federal court and subsequently pled guilty. Mr. Edwards faces a guideline range of 262-327 months. Mr. Graham provided substantial assistance to the government.

That the undersigned has consulted with Special Agent Craig Townsend, the case agent in this matter, concerning this motion. Special Agent Craig Townsend concurs with the information that is contained herein

WHEREFORE, the government moves that this Honorable Court grant the Motion for Downward Departure as herein requested in the case of ANTWAN LAVERN GRAHAM

Respectfully submitted,

**WILLIAM N. NETTLES
UNITED STATES ATTORNEY**

By: /s/ Alfred W. Bethea, Jr.
Alfred W. Bethea, Jr.
Assistant U.S. Attorney
Post Office Box 1567
Florence, SC 29503
(843) 665-6688

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ANTWAN LAVERN GRAHAM) **CERTIFICATE OF SERVICE**
)

I hereby certify that as attorney of record I have caused Laura H. Brown, legal assistant, to serve on June 22, 2010, a true and correct copy of the attached **MOTION FOR DOWNWARD DEPARTURE** via the court's e-noticing system, but if that means failed, then by mailing through the United States mail, postage paid, the same on the following person:

Wallace H. Jordan, Jr.

/s/ Alfred W. Bethea, Jr.
ALFRED W. BETHEA, JR.

Florence, S.C.
June 22, 2010